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9 AIRLINES REPORTING CORPORATION

10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 AIRLINES REPORTING CORPORATION,

13 Plaintiff/Judgment Creditor,

14 v.

15 COMMERCIAL TRAVEL CORPORATION
16 d/b/a MATLOCK TRAVEL, et al.,

17 Defendants/Judgment Debtors.

18 Case No. 08-MC-00088

19 **DECLARATION OF SUZANNE LEWIS IN
20 SUPPORT OF MOTION FOR AN
21 ASSIGNMENT ORDER**

22 Date:

23 Time:

24 Ctrm:

25 Judge: Hon.

26 I, Suzanne Lewis, declare:

27 1. I am an attorney licensed to practice law in the State of Virginia. I am an associate of
28 Bonner Kiernan Trebach & Crociata, LLP, attorneys of record for Plaintiff/Judgment Creditor Airlines
Reporting Corporation in the above-captioned matter against Defendant/Judgment Debtor Mario Renda
to enforce the judgment, in the sum of over \$700,000.00 entered by the United States District Court,
Eastern District of Virginia.

29 2. If called upon to testify, I could and would competently testify to the matters contained
30 herein based upon my personal knowledge, except as to those matters stated upon information and
31 belief, and as to those matters I am informed and believe thereon allege that they are true and correct
32 based upon my reasonable investigation.

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Factual Background

3. On September 4, 2007, and after Plaintiff Airlines Reporting Corporation and I filed a Motion for Entry of Judgment by Default Against Defendant Mario Renda and Robert Kremer the United States District Court, Eastern District of Virginia, entered judgment in favor of Plaintiff/Judgment Creditor and against, *inter alia*, Mario Renda. The judgment entered was in the principal sum of \$701,942.81. The Virginia District Court has diversity jurisdiction over this matter because Creditor ARC is a Delaware corporation with its principal place of business in Arlington, Virginia. I am informed and believe that Judgment Debtors MARIO RENDA and ROBERT KREMER, are residents of California.

4. The Virginia District Court judgment resulted from Debtor Renda defrauding Creditor, of monies due from federally controlled airline ticket sales by diverting funds to themselves and deliberately failing to report all sales. The judgment includes liability against Debtor Renda for both fraud and conversion.

5. Specifically, Debtor performed one or more of the following acts against Creditor ARC:
 - purposefully failed to properly report all of the ticket sales;
 - fraudulently diverted monies owed from ticket sales to himself;
 - issued Creditor's documents against a credit card without the cardholder's authority, or against a stolen or otherwise fraudulent credit card;
 - falsified reports, traffic documents, or other documents; and
 - used credit cards which were issued in the name of a third party for the purchase of air transportation for sale or resale to other persons without the permission of the third-party credit card holder or carrier.

6. Creditor ARC also obtained a judgment against, *inter alia*, Debtor Renda in the Circuit Court of Arlington County, Virginia (“State Court judgment”) based upon like conduct. In that matter, Debtor Renda was conducting ticket sales under an unrelated third party entity. The principal amount of the State Court judgment is \$2.5 million.

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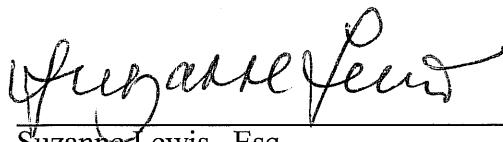
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1 7. Despite Creditor ARC's numerous reasonable demands, Debtor Renda has failed and/or
2 refused to pay any portion of this debt, or the State Court judgment.

3 I declare under penalty of perjury under the laws of the United States of America and the State
4 of California that the foregoing is true and correct. This Declaration is executed this 14th day of April,
5 2008, in the District of Columbia.

6 By:


7 Suzanne Lewis, Esq.

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